

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

HIGH TECH REPUBLIC, INC. d/b/a  
WEBINOPOLY

*Plaintiff,*

v.

SHOPIFY, INC.; SHOPIFY COMMERCE  
SINGAPORE PTE. LTD.; and SHOPIFY INT.  
LTD.,

*Defendants.*

Civil Action No. 4:23-CV-03348

**STIPULATED UNOPPOSED MOTION TO EXTEND**  
**DEFENDANTS' RESPONSE DEADLINE**

Plaintiff High Tech Republic, Inc. d/b/a Webinopoly (“Plaintiff”) and Defendants Shopify Inc., Shopify Commerce Singapore Pte. Ltd., and Shopify International Limited (together, the “Defendants”) file this Stipulated Unopposed Motion to Extend Defendants’ Response Deadline, and hereby stipulate and agree as follows:

Plaintiff filed its Original Complaint on September 7, 2023 (*see* Dkt. 1), and requested waiver of service of process from Defendants on September 26, 2024 (*see* Dkt. 31-33). Because Defendants are foreign entities outside of the United States, their deadline to serve an answer or motion under Rule 12 of the Federal Rules of Civil Procedure is December 26, 2024. *See* FED. R. CIV. P. 4(d)(3).

Counsel for Plaintiff and Defendants (collectively, the “Parties”) agreed to briefly extend Defendants’ deadline to file their response to the Complaint so that the Parties’ respective briefing deadlines do not overlap with their respective counsels’ holiday or travel schedules.

Therefore, the Parties, by and through their undersigned counsel, stipulate and agree,

subject to approval of the Court, that Defendants' deadline to file their responses to Plaintiff's Complaint is continued from December 26, 2024 to **January 10, 2025**.

**CONCLUSION AND PRAYER**

For the reasons set forth above, the Parties respectfully request that this Court extend the time for Defendants to file their responses to Plaintiff's Complaint, and grant any other relief to which they are entitled at law or in equity.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record.

/s/ Eric Chenoweth  
Eric Chenoweth